

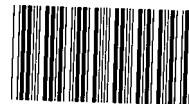


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

DEC 13 1999



01504VIC-V

Ref: 8P-W-GW

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Ms. Theresa Santangelo-Dreiling
CDOT Project Manager
State of Colorado Department of Transportation
Office of Environmental Services
4201 East Arkansas Ave., Room 284
Denver, Colorado 80222

Re: UNDERGROUND INJECTION CONTROL (UIC)
Class V Injection Well
Rule Authorization for a Remediation Site Pilot Test
CDOT Region 6 Headquarters Facility
(EPA File #CO5000-04976)

Dear Ms. Santangelo-Dreiling:

The Environmental Protection Agency (EPA) has reviewed the information submitted on behalf of the Colorado Department of Transportation by Harding Lawson Associates on the proposed pilot test injection of nutrients, hydrogen peroxide, and a co-metabolic food source. Based on the review and evaluation, EPA has decided, pursuant to Title 40 Code of Federal Regulations (40 CFR), §144.24 (as modified in part January 3, 1994), that a permit is not necessary at this time for this pilot test injection. However, this activity is subject to the rule authorization requirements outlined in 40 CFR, including, but not limited to, §144.11, §144.24, and §144.27 (as modified in part January 3, 1994). This authorization is limited to a pilot scale test at Region 6 Headquarters Facility located at 2000 South Holly Street in Denver, Colorado, and is based on information included in the proposal dated November 9, 1999, submitted by Harding Lawson Associates in behalf of CDOT, and is valid for:

The injection of ammonium nitrate, potassium phosphate, hydrogen peroxide, and methane into the subsurface to evaluate the effectiveness of these constituents in the degradation of methylene chloride, 1,1-dichloroethene (1,1-DCE), trichloroethene (TCE), and tetrachloroethylene (PCE) in the groundwater.

Based on our understanding of the contamination present at the site, the injectate constituents, and the parameters of the proposed pilot test specifically, EPA believes this injection will not adversely impact ground water. For this reason, you may proceed with the proposed program and you will not be required to operate under an Underground Injection Control permit at this time.

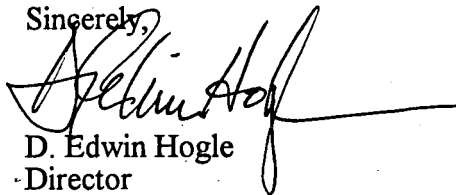
Any changes in operating methods, the proposed time frame for the pilot test, or any other conditions specified in your request dated November 9, 1999, *must be approved in advance* by the EPA. If injection is required for the final remediation strategy at the site, a modification of this Rule Authorization will be required. At that time, EPA will request the monitoring information generated from this pilot scale test to evaluate the behavior of in injection constituents, particularly nitrate, in the groundwater downgradient from the point of injection in both the upper and lower sandstone units. Please be advised that this rule authorization pertains to Underground Injection Control (UIC) solely and does not relieve you from satisfying the Colorado Department of Public Health and Environment regulations for total site remediation. Nor is it the intent of this authorization to preclude any other federal, state or local regulations that may apply.

Please send all correspondence to:

U. S. Environmental Protection Agency
Attention: Valois Shea
MAIL CODE: 8P-W-GW
999 18th Street, Suite 500
Denver, CO 80202-2466

If you have any questions concerning this rule authorization, or for interpretation of Class V regulations, policies, and guidance, please contact Valois Shea at (303) 312-6276.

Sincerely,



D. Edwin Hogle
Director
Groundwater Program
Office of Partnerships and Regulatory Assistance

cc: Paul H. Weaverling, Harding Lawson Associates
John Wilken, Harding Lawson Associates